

**CONTINUATION OF APPLICATION FOR A CRIMINAL COMPLAINT AND  
ARREST WARANT**

I, Scott Bauer, being duly sworn, state the following is true and correct to the best of my knowledge and belief:

**INTRODUCTION, AGENT BACKGROUND, AND PURPOSE OF THE WARRANT**

1. The facts of this case, as more fully detailed below, reveal that the user of Motherless.com account "boredohioman" and Tox account, "boredohioman," and identified as William George MOON, traveled by vehicle to the Wyoming, MI area from Urbana, OH to meet with what he believes to be the mother of a 12-year-old girl. The purpose of the meeting is for the target to gain confirmation that the mother is not a law enforcement agent. This trip was planned to satisfy MOON that the mother and daughter exist. MOON stated that after he confirms their existence, he will depart West Michigan and will return on a subsequent trip to engage in sexual conduct with what he believes to be a 12-year-old girl.

2. This crime was facilitated via the use of the Internet with communication beginning in January of 2024.

3. I am familiar with the information contained in this continuation based upon the investigation I have conducted and based on information provided to me by other law enforcement officers.

4. The facts in this continuation come from my personal observations, my training and experience, and information obtained from other agents and witnesses. Since this continuation is being submitted for the limited purpose of securing a search

warrant, I have not included each and every fact known to me concerning this investigation. I have set forth only the facts that I believe are necessary to establish probable cause.

5. I, Scott Bauer, am currently employed as a Special Agent with Homeland Security Investigations (HSI) and have been so employed since March of 2012. I am currently assigned to HSI Grand Rapids, MI. As an HSI Special Agent, I have investigated (among other crimes) criminal violations of U.S. Customs laws, and federal child sexual exploitation violations, to include those involving the use of the Internet and interstate communications. I have received training in the investigation of child sexual exploitation and I have conducted numerous investigations relating to sexual crimes against children through the use of the Internet. As a federal agent, I am authorized to investigate violations of laws of the United States and to execute warrants issued under the authority of the United States.

6. Prior to employment with HSI, I was a Special Agent with the United States Department of the Interior (DOI) Office of the Inspector General (OIG) for approximately four years, focusing on the investigation of fraud, public corruption, and cyber-crimes, to include investigations relating to child sexual exploitation. Prior to employment with the DOI OIG, I was a Police Officer with the City of Casselberry, Florida for approximately two years and eight months.

7. This continuation contains information necessary to support a finding of probable cause to charge William George MOON for violations of 18 U.S.C. § 2422(b) and 18 U.S.C. § 2423(b). 18 U.S.C. § 2422(b) makes it a crime to knowingly persuade, induce,

entice, or coerce any individual who has not attained the age of 18 years, to engage in prostitution or any sexual activity for which any person can be charged with a criminal offense, or attempts to do so. 18 U.S.C. § 2423(b) makes it a crime to travel in interstate commerce for the purpose of engaging in illicit sexual conduct, or attempts to do so.

8. It is a criminal sexual conduct in the first degree to engage in sexual penetration with another person who is under 13 years of age, in violation of Michigan penal code § 750.520b. "Sexual penetration" means sexual intercourse, cunnilingus, fellatio, anal intercourse, or any other intrusion, however slight, of any part of a person's body or of any object into the genital or anal openings of another person's body, but emission of semen is not required. It is criminal sexual conduct in the second degree to engage in sexual contact with another person who is under 13 years of age, in violation of Michigan penal code § 750.520c. "Sexual contact" includes the intentional touching of the victim's or actor's intimate parts or the intentional touching of the clothing covering the immediate area of the victim's or actor's intimate parts, if that intentional touching can reasonably be construed as being for the purpose of sexual arousal or gratification, done for a sexual purpose.

9. All grammatical errors in the quoted communication between the target and SA Bauer detailed in this continuation are from the original communication. The communication detailed below is not necessarily in chronological order.

### FACTUAL BACKGROUND OF INVESTIGATION

10. On January 10, 2024, HSI Grand Rapids Special Agent (SA) Bauer, acting in an undercover (UC) capacity, entered the Motherless.com chatroom (SA Bauer maintained an undercover account on Motherless.com that described SA Bauer as a single female, residing in the Midwest, and suggested the user had a child). SA Bauer received a private message from Motherless.com user **boredohioman** who initially asked about the weather and stated he was located near Dayton, OH. The target asked if the UC was "hot" and asked, "and do you have a daughter?" The target was told the UC had a 12-year-old daughter. The following exchange then occurred:

- a. boredohioman: would you teach her to suck cock?
- b. UC: Id maybe let her be taught
- c. UC: do you have t o x?
- d. boreohionman: would you help? grand rapids isnt that far

11. At the suggestion of the UC, the conversation moved to Tox and the vast majority of communication then occurred via the Tox message platform. The target's Tox username was "**boredohioman**." On January 10<sup>th</sup>, the following communication occurred via Tox:

- a. boredohioman: So you like that idea about your daughter?
- b. UC: Im open
- c. boredohioman: When did you learn?
- d. UC: 11

e. UC: Did I tell you my dau is 12? Sorry I get hit up by a lot of guys in ML  
lol

f. boredohioman: Yes. She's behind. Who taught you?

g. UC: Id rather not get into it

h. boredohioman: Ok. I understand. Would you help you daughter?

i. boredohioman: Your

j. UC: Id rather just watch

k. UC: Want her to have her own expereince

12. The target later asked, "And she's she's ok with sucking and fucking older men." The target stated he wanted to "Chat here, see how it goes. Come visit, see how that goes. Go from there." The following exchange later occurred:

a. boredohioman: What would happen if your daughter got pregnant?

b. UC: she hasnt had her period yet so Im not worried about that

c. UC: but once she gets it condoms are required

d. UC: I will not be a grandma!

e. boredohioman: 

f. UC: what did you mean when you said visit and see how that goes?

g. boredohioman: Can we get her on the pill?

h. boredohioman: And I meant see if everyone gets along

i. UC: so nothing would happen?

j. UC: Im not sure about the pill

k. UC: are you clean?

1. boredohioman: I guess it depends. Long way off. I haven't even seen either of you yet. And yes I'm clean

13. The subject was told the 12-year-old girl's name was Stephanie but the UC called her "Steph" and that daughter liked to draw. The target would later refer to the girl as "the artist" and "Steph the Artist."

14. Later in the conversation the subject wrote, "I just want to be sure you are real. Just like you don't want to loser her, I don't want to go to jail." The subject stated he was 59 years old and asked if the minor daughter would be ok with his age. Later during the same conversation the target wrote, "I'm talking with a gorgeous lady who is talking about letting me... For lack of a better word....Date her 12 year old daughter. Do you know how impossible that is?"

15. Throughout the communication the target repeatedly expressed his fears that the UC was in law enforcement and that this was a law enforcement operation and at one point stated he had "homework" for the UC and wrote, "It's find a way to prove... Prove... You aren't with any law enforcement agency."

16. The UC repeatedly told the target he could change his mind at any time, which the target said made him nervous as it was something a law enforcement officer would say and that he continually deleted the pictures and communication. The target also stated the UC and the daughter could also change their minds at point. The UC also repeatedly told the target that any sexual contact with the mother was not an option, which the target acknowledged on several occasions.

17. On January 11<sup>th</sup>, 2024, the following exchange occurred:

a. boredohioman: And remember I'm coming there. You aren't coming here.

b. UC: ?

c. boredohioman: That shows intent, the way the law sees it, the intent to commit a crime. And crossing state lines I believe makes it a federal charge.

18. Later during the same conversation, the target wrote, "It's a shame we didn't start out as friends first. We would have gotten along great and then the rest would have been no problem. We did it backwards." When asked to clarify this, the target wrote, "We did the sex with the daughter talk first. Then became friends. If we had become friends, gotten to know each other first, then the sex with Steph wouldn't be any problem" and added, "She would either be ok or not and we'd still be friends".

19. On January 17<sup>th</sup>, while discussing what the subject was interested in, the subject wrote (in part), " I'm seriously ok with anything. If we just talk, or if you or her change your mind or if it turns into some type of relationship, I'm cool." The following exchange then occurred:

a. boredohioman: Ok. This will sound goofy. But I'd like it if the three of us had some type of 'family' relationship together. But you said that's not possible, so it's cool.

b. boredohioman: And I make sense all the time.

c. UC: whats a "family relationship" mean

d. UC: I want everything to be about her

e. UC: if that's not for you it's totally fine

f. boredohioman: Same here. If she is ok, with a one time thing, that's fine. If she wants more of a relationship, that is ok. But I don't know you and her expect

20. In a subsequent conversation on January 23<sup>rd</sup>, the subject wrote, "What I'd like is to eventually have sex with the both of you together but you said that won't happen. So I guess I'd just like to see her as long as she's happy".

21. The UC and the target then discussed ways to decrease their fears of either being in law enforcement. The UC told the target an STD test would be required with the results shown to the UC and the first meeting would have to occur in a public setting. The target stated he didn't believe the UC would comply with his requests "because it would be stuff the police couldn't do" which he later clarified to be "bad pics" of the mom and daughter. This was further clarified to be nude pictures of both, which later turned into a request for a video of the UC and daughter. This is discussed in further detail in a subsequent section.

22. The target suggested the UC and daughter drive to Ohio for the lunch meeting and offered to pay for the UC's gas for the trip. It would later be discussed that only the UC would travel, the target agreed to pay for gas and lunch and settled on \$75 to cover the expense.

23. The UC and the target discussed meeting in Springfield, OH, but due to the distance the UC would be required to drive the two discussed meeting in Northwest Ohio. Due to the rural area, the UC stated a meeting in Toledo would be more

comfortable, to which the target agreed. Eventually the pair agreed to meet in Wyoming, MI.

24. The UC and the subject planned to meet each other at McAllister's Deli, located at 2380 Health Drive SW, Wyoming, MI 49519 on a date and time to be determined by the target and shared with the UC only after the target arrived. The UC and the target agreed the purpose of this meeting would be only to confirm neither were in law enforcement and were in fact who each claimed to be with the target providing the results of the STD test to the UC. No sexual contact would occur during this first meeting and the daughter would not be present. While discussing this meeting, the subject wrote, "But if you are a cop, I'm pretty sure this meeting shows premeditation to commit a crime." Upon confirmation the UC wasn't a law enforcement officer, the target would wait one week and then travel back to West Michigan to engage in sexual intercourse with the daughter.

25. On January 30, 2024, while discussing his fears of the UC being a law enforcement officer, the subject wrote, "Like if I was a cop, I'd keep offering you the chance to get out of it. That way if you do it, it's clear it was your decision." Later on January 30<sup>th</sup>, the subject wrote, "And I really want to fuck your daughter.. a lot. Is that ok?"

26. The subject offered to buy the daughter gifts on numerous occasions to include a car if the relationship still existed when she turned 16. While discussing gifts, the target wrote, "Look. If I'm sleeping with her, I'm just gonna ask her. So you might as

well get used to it. ". The subject would later purchase several gifts for the girl which will be detailed in a subsequent section.

27. On February 5, 2024, while discussing the minor girl's concern about sex hurting, the target wrote, "Yes. It has to be fun for her. If it hurts too much we can do other things", he would later clarify this to mean, "Sex isn't just putting your dick in and pumping. If you don't know, we need to get together first. Lol" and added, "Yes oral. I'm assuming she's curious about all of that." Later during the same conversation, the subject wrote, "It's her first time. I want it to be right, special for her."

28. Target stated, "I like tiny butts and tiny breasts" on February 6<sup>th</sup> and later asked the UC to tell the minor girl, "I know she is nervous but nothing she does will be wrong. I love tiny butts and breasts, so I think she's gorgeous. I think she looks stunning and that she's an amazing artist. And I'm excited get her tattoo." The subject would later write, "Can I see her butt?" "Lol. Send me pics....Lol".

a. Agent' s Note: The target stated he wanted to get a tattoo designed by the daughter, this is detailed in a subsequent section.

29. On February 6<sup>th</sup> after the UC told the target he was restoring the UC's faith in men, the target responded, "Well we are talking about me banging your young daughter so let's not get carried away there."

30. On February 23<sup>rd</sup>, the target asked, "You think she will let me eat her butt?" The subject later wrote, "Ok. Let's talk about her butt some more. It's stuck in my brain. Is it tiny?"

31. On February 26<sup>th</sup>, the target wrote, "Does she want to give head and have her pussy eaten?" The UC told the subject the daughter wanted to try everything. Later on the same day, the subject wrote, " I think about eating her pussy all the time" and "I really want to eat her pussy. I love doing it and I think she will really like it".

32. Later on February 26<sup>th</sup>, the target believed he was communicating with the 12-year-old girl online, with the UC typing for the minor girl. The following exchange occurred:

- a. boredohioman: So are you nervous?
- b. UC: "yeah alot"
- c. boredohioman: Guess what? I'm nervous too. I think that's normal. I'm also very excited
- d. UC: "ok"
- e. boredohioman: I know your mom is too. But it will be fun. We will only do things you want to do. And if you change your mind, that's perfectly ok. I want you to have fun.

33. The target would later write, "You can tell her I really want to eat her pussy if you want".

34. On February 27<sup>th</sup>, the target stated:

- a. boredohioman: I like the idea of fucking her...a lot
- b. boredohioman: The idea of spending a long weekend fucking your 12 year

daughter a lot makes my cock hard

c. boredohioman: I think about fucking every single minute

d. boredohioman: Fucking her

35. The subject then added:

a. boredohioman: I'm thinking about her sucking my cock and how good her pussy is going to taste

b. boredohioman: I love the idea of seeing her a lot and being out it in public with her and then going back and making her feel good

c. boredohioman: If I could, honestly, I would fuck her right now.

36. Later on the same day, the subject wrote, "Tonight, ask your daughter how bad she wants me to fuck her" and later added "I think about fucking her constantly." Also on February 27<sup>th</sup>, the target wrote, "Can you imagine her when she learns to be on top and is riding my cock? You would not be a good mom if you didn't let that happen.

🟡"

37. On January 19<sup>th</sup>, when asked what the target wanted, the target stated, "I want to bang your daughter". Later during the same conversation, when asked why the target didn't want to speak more about his plans with the minor girl, the target wrote, "Talking about committing illegal acts."

38. In March, while discussing a date to meet, the target advised meeting at a predetermined time and location made him nervous about being arrested. The target

stated he preferred to travel to West Michigan without notifying the UC and once at a location, send a message to the UC stating where he was. The UC would then meet him at the location. The UC agreed to this scenario. It is possible the target will change the location upon his arrival into the West Michigan area.

#### **VIDEO REQUESTED BY MOON**

39. As previously stated, the target was concerned about the UC being in law enforcement and expressed those concerns throughout the communication. The target stated the only way he could know for sure would be for the UC to create a video of the UC and the daughter, naked, and then transmit that video to the target prior to any meeting.

40. The target wrote, "But you have to understand what you are offering is too good to be true." While discussing the risks involved, the target wrote, "Ok. How about this? You make a video with you and daughter, naked. You say.. Please come fuck my daughter.. And then she says .. Yes please come fuck me. And bring me an art set. I would be assuaged." The UC told the target making and sending that video could result in her going to jail and the target assuted the UC he would delete the video.

41. During conversations involving this video, the target would state he no longer wanted the video, state the purpose of the video was only to confirm the UC was not in law enforcement and he did not wish to keep the video. The target also asked for a naked video of the UC alone "saying you want me to fuck your daughter".

42. At one point the UC and target were jokingly discussing making the video

in Grand Rapids with the target present. The target then wrote, "If I was in your house, and you both were naked, and you said come fuck my daughter, and then she says, yes come fuck me... You would have to explain a dead man in your house!"

43. On January 29<sup>th</sup>, the UC asked the target to restate what the target wanted the video to depict. The target wrote, "You both naked, you saying come fuck my daughter. And her then saying, yeah Will come fuck me."

44. On January 30, 2024, while discussing the video, the subject wrote, "You know if you just sent me a video of you 2 naked, you wouldn't have to drive here. That's myp lame attempt to get you to do it tonight. Pretty lazy huh?"

a. Agent's Note: At one point the UC and the target planned for the UC to travel to Ohio to meet the target.

45. On February 1, 2024, the subject wrote, "The video isn't that big of a deal. I mean it's super hot. But I guess if we meet and you don't arrest me, I'll know you're real and serious. Video or not."

46. The subject would later write, "I'd like proof of everything before I come there but I don't think that's going to happen. So I'm willing to not have it. Maybe if everything goes ok, you can make it in a year or so." The subject would later add "If you want. If you don't, it's ok. By then, if everything is going well, it won't be a big deal".

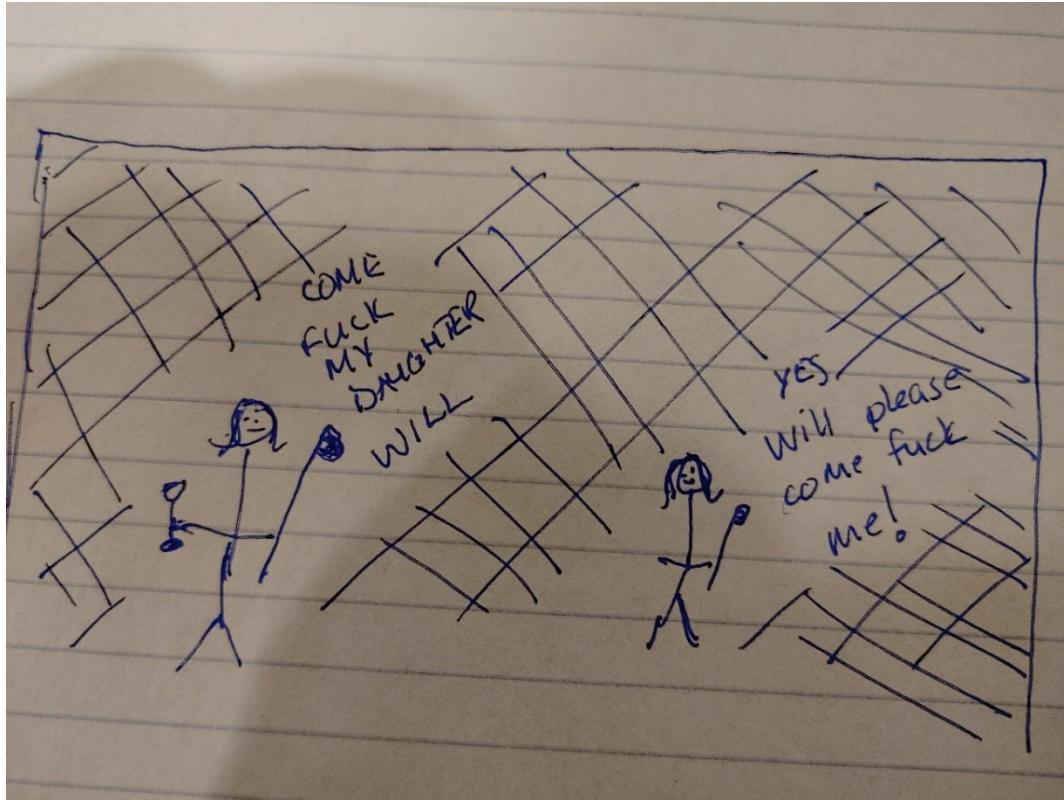
47. On February 5, 2024, after saying the video did not have to be produced, the target wrote, "Who knows maybe she will want to make the video and she can talk you into sending it.  Lol."

48. On February 20<sup>th</sup>, while discussing easing the target's concerns about the UC being in law enforcement, he wrote, "It's up to you. You could just send me one pic and be done with it all." Later, during the same conversation, following exchange occurred:

- a. boredohioman: If we meet, and you don't swarm me with cops, then I'll know you are real. The video doesn't really matter then. Other than that it would be really hot to see you both naked.
- b. UC: lol so you wanna see us naked but not to prove anything?
- c. boredohioman: If I see it after I meet you, it doesn't prove you are real. I already know you are when I meet you.
- d. boredohioman: Who would not want to see you both naked?
- e. UC: ok so no video
- f. boredohioman: Unless I can see it before we meet, it doesn't really serve a purpose. And you seem stressed about talking to her about it, and if she's gonna stress, it's not worth it

49. The UC and the target discussed the UC bringing the video to their lunch meeting and showing the target. The target would later write, "Bringing things to lunch is too late. If I'm not arrested, I'll know you are real and serious." Later the target wrote, "I just want to not be arrested".

50. On February 7<sup>th</sup>, the target stated he drew the below picture in reference to the video:



### GIFTS FROM MOON

51. The subject offered to purchase gifts for both the UC and the daughter. He repeatedly said he would continue to purchase gifts for the girl regardless of them meeting or having sex and these gifts came with no strings attached.

52. On January 22<sup>nd</sup>, the UC provided the target with a link to an art set listed for sale on Amazon for approximately \$40. The target stated, "You sure there's not a better one? I'm serious, money is not an object."

53. Later on January 22<sup>nd</sup>, the UC provided the target with a link to an art set listed for sale on Amazon for approximately \$109. The subject would later purchase and send that art set to the UC. The final price for the item was \$136.15 and the item was addressed to "Steph the Artist". The item was gift wrapped with a message that said

"Hope you enjoy your art set, Steph. From A friend of a friend" The art set is pictured below



54. On January 31, 2024, while discussing additional gifts for the girl, the target wrote "Buy thongs and those socks that are real long that go to her butt. You know the ones?" The UC and the target would discuss the thongs and socks on numerous occasions with the target adding that he liked "bright colors." The target instructed the UC to find thongs and socks and tell him the cost so he could pay for them.

55. On February 23<sup>rd</sup>, the UC sent the target two Amazon links. One associated with thong underwear for kids and the other associated with thigh high socks. The target then wrote, "I can't get the vision of her butt in those out of my head. Sorry." The subject later wrote, "Lol. I can't stop thinking about her butt in thongs."

56. The subject stated he intended to create a separate Amazon account for the UC and the daughter so he did not have to navigate the correct size and "Then all I have

to do is REALLY hit buy".

57. On February 27th the subject advised he purchased the thongs and socks and on February 29<sup>th</sup> they were delivered. SA Bauer retrieved the items on March 1<sup>st</sup>, they were addressed to "STEPH THE ARTIST" and they are pictured below:



#### STD TEST

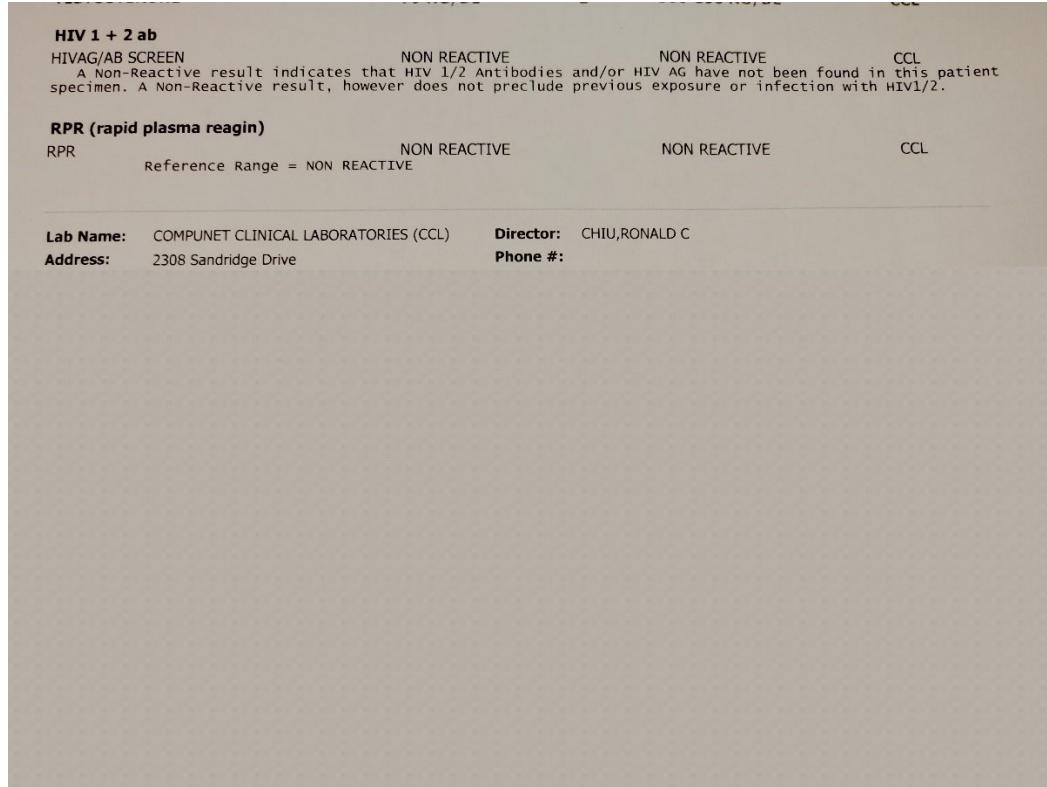
58. During the communication the target agreed to get an STD test. While discussing showing the results to the UC, the target wrote, in part, "If you are the cops, that's evidence." Eventually the UC and the target agreed that the target would bring the STD results to the lunch meeting with the UC.

59. While discussing this plan, the subject wrote, "I will get the test and the results. I will show them to you. It seems like you're trying to use this as proof that I'm

trying to get with your daughter. Are you setting me up?" The UC assured the target it wasn't a setup but rather the UC was expressing the concerns that the target was not serious about his intentions and this would prove those intentions.

60. The subject advised he made an appointment and would be getting an STD test on February 2nd. On February 1st, the subject stated he lied to his insurance company so they would pay for the test as they required a justification for the test. The subject did not provide an honest answer for what he told his insurance company.

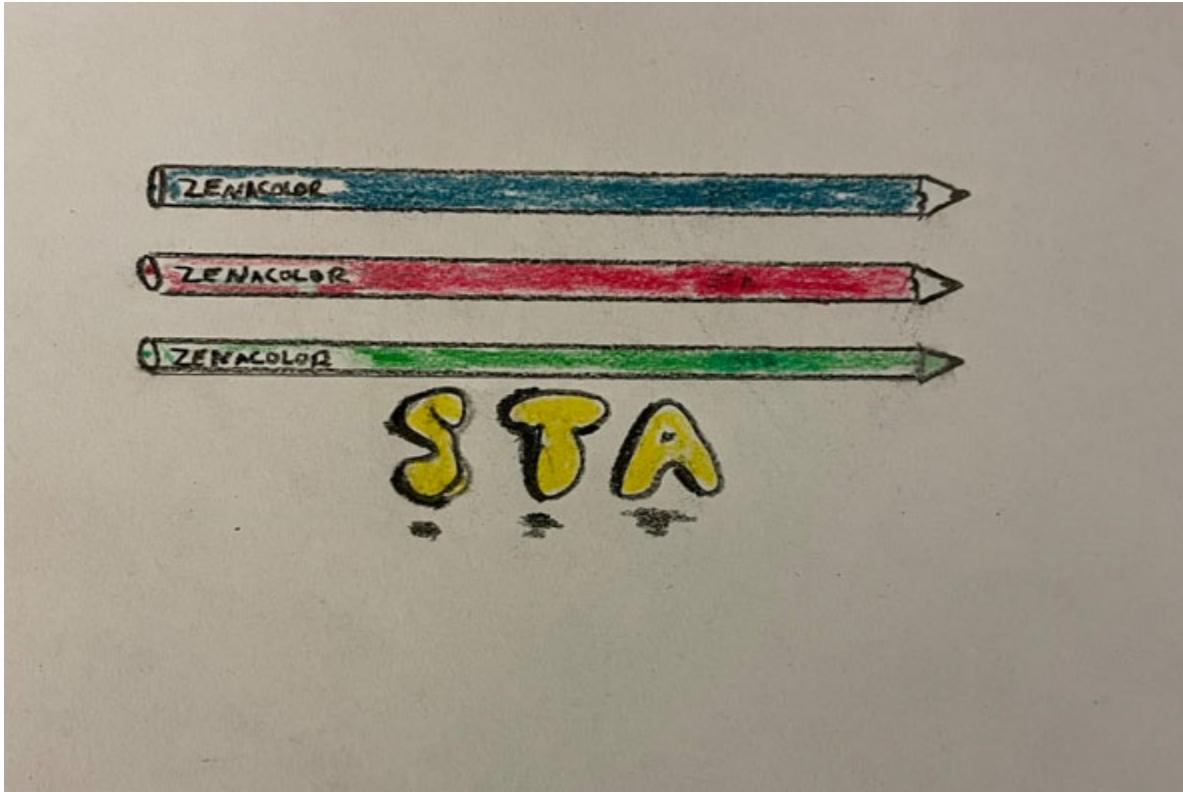
61. On February 5th, the subject stated he took an STD test. On February 19<sup>th</sup> the target told the UC the results of this indicated he did not have any STDs. On February 22<sup>nd</sup>, the target stated, "I did pick up my lab results today" and on February 28<sup>th</sup> the target sent the below picture which detailed his HIV results were negative (the subject advised he was tested for other STDs as well).



## TATTOO

62. The UC and the target discussed the target getting a tattoo during the second or other subsequent trips. The target requested the daughter design this tattoo. The target requested the tattoo be "something that reminds me of her." The target later wrote, in part, "I'm getting something she design's." The subject also requested the minor girl's input on the tattoo location on his body.

63. The UC sent the below image, drawn by SA Bauer, to the target and stated the daughter had designed and drawn the image (the "STA" references "Steph The Artist" and the pencils depict ones that were part of the art set sent by the target).



#### **IDENTIFICATION OF WILLIAM GEORGE MOON**

64. During the communication with the UC, the target stated he resided in Ohio, specifically that he was close to Dayton and Columbus. The target also stated his name was Will, he was 59 years old, and sent images of himself to the UC.

#### **SUMMONS TO MOTHERLESS.COM**

65. On January 10, 2024, SA Bauer served a DHS summons to Motherless.com requesting subscriber information related to user **boredinohio**. On January 11, 2024, Motherless.com responded and provided the following information:

- a. Date Joined Jan 5th 2024 10:32:48 EST
- b. Date Last Login Jan 10th 2024 10:15:56 EST
- c. IP Joined 75.185.87.241

d. IP Last Login 75.185.87.241

e. Email Address williamgmoon1@gmail.com

f. A log of user logins detailing dates/times and IPs.

66. Via publicly available internet research, the IP address **75.185.87.241** was determined to be associated with Charter Communications (Spectrum).

67. Based on the user's email (provided by Motherless.com), SA Bauer located a William G. MOON via Accurint. MOON was 59 years and listed an address of 1473 Knight Road in Urbana, Ohio. Urbana is just north of, and in between, Dayton and Columbus.

68. Based on the DOB listed in Accurint, SA Bauer was able to obtain Ohio driver's license information for MOON. MOON's driver's license photo matched the images sent by the subject. The address listed on the driver's license was 1473 Knight Road in Urbana, Ohio.

#### **SUMMONS TO CHARTER COMMUNICATIONS (SPECTRUM)**

69. On January 11, 2024, SA Bauer served a DHS summons to Charter Communications (Spectrum) requesting subscriber information related to **75.185.87.241**. On January 17, 2024, Spectrum provided the following information:

a. Subscriber: William MOON

b. Service Address: 1473 KNIGHT RD, URBANA, OH 430788234

c. Phone Number: 937-508-9899

70. During communication with the UC, the target stated he drove a White

Jeep Grand Cherokee. A check of vehicles registered to MOON revealed a 2015 White Jeep Grand Cherokee bearing Ohio license plate JJA189 and registered to MOON at 1473 Knight Road, Urbana, OH.

71. MOON also had a 2009 Black Honda Pilot bearing Ohio license plate FDB3726 and also registered to MOON at the Knight Road address.

#### **PREVIOUS ARREST OF MOON**

72. On January 22, 2024, HSI Columbus, OH Special Agent (SA) Kenneth Teich obtained Westerville Police Department (WPD) Report 2005-00002965 from WPD and provided it to SA Bauer. The report is summarized below.

73. In April of 2005, a WPD officer posing as a 14-year-old received a message from an individual that was ultimately identified as MOON. MOON asked the UC "several sexual questions" and stated he also utilized an account called, "BORED\_IN\_OHIO\_M" before the conversation ended.

74. In August of 2005, the two made plans to meet with the purpose of MOON paying the girl for sexual intercourse. The two specifically discussed anal sex. MOON arrived to the predetermined location and requested the girl walk outside so he could observe her.

75. MOON was then taken into custody and charged with and convicted of Importuning (felony), which is essentially the solicitation of sexual conduct with a minor.

76. MOON pleaded guilty in July of 2006 and was sentenced 3 years of probation, credited with two days of incarceration, and classified as a sexually oriented offender.

### **BACKGROUND ON MOTHERLESS.COM**

77. Motherless.com is free website that allows users to create profiles and post pornographic videos and pictures based a variety of sexual interests. Motherless.com members may also conduct a search for videos and pictures posted on the website using a keyword search. The main page of Motherless.com reads, "Motherless is a moral free file host where anything legal is hosted forever! All content posted to this site is 100% user contributed. All illegal uploads will be reported. If you want to blame someone for the content on this site, blame the freaks of the world – not us. Feel free to join the community and upload your goodies." Motherless.com members may also create and join a variety groups on the website based on their sexual interests, including over 100 groups. Motherless.com members may post advertisements in the website's "classified" section seeking to meet other members with the same sexual interests such as incest and rape. In addition, Motherless.com members may use the website's chat room service and instantly communicate with other members.

78. In my knowledge and experience and in the knowledge and experience of other law enforcement investigators, Motherless.com is regularly used by individuals who have a sexual interest in child as a means to communicate with other like-minded individuals and as a forum to meet others for the purpose of having sex with minors and to share child pornography.

### **BACKGROUND ON TOX**

79. Tox is a messaging platform that is free to download by any user. Once the program is downloaded and installed, it allows users to communicate directly with each

other in a one-on-one session. Files, such as pictures and gifs for example, are able to be shared between users.

80. According to the Tox website, Tox is, "A new kind of instant messaging. Whether it's corporations or governments, digital surveillance today is widespread. Tox is easy-to-use software that connects you with friends and family without anyone else listening in. While other big-name services require you to pay for features, Tox is completely free and comes without advertising – forever."

81. "Tox is made by the people who use it – people fed up with the existing options that spy on us, track us, censor us, and keep us from innovating. There are no corporate interests, and no hidden agendas. Just simple and secure messaging that is easy to use."

82. In my knowledge and experience and in the knowledge and experience of other law enforcement investigators, Tox is commonly used by individuals to talk about their sexual interest in children. Because Tox advertises itself as more secure, individuals who want to discuss illegal acts with children feel more free to openly discuss their interests.

#### **PING WARRANT AND ANTICIPATORY SEARCH WARRANT**

83. On March 6, 2024, I requested and obtained federal warrants to track MOON's cellular telephone and to seize and search digital devices on his person and in his vehicle in anticipation of his arrival in the Wyoming, Michigan, area to meet with the UC. (Anticipatory Search Warrant, 1:24-mj-89; and Ping Warrant, 1:24-mj-90). Because MOON refused to schedule in advance a date, time, and location to meet, the warrant

authorizing location information for his cellular telephone was necessary for investigation and for officer safety.

### **ARREST OF MOON**

84. On March 19, 2024, at approximately 6:08 a.m. cellular location information for MOON's cell phone indicated that he departed from his residence. At approximately 8:28 am, cellular location information for MOON's cell phone indicated he had crossed into Indiana from Ohio. At approximately 9:28 am, cellular location information for MOON's cell phone indicated he had crossed into Michigan from Indiana. At approximately 11:01 a.m. MOON's cellular telephone was in near U.S. 131 and Highway 6, which is in the area of Wyoming, Michigan.

85. On March 19, 2024, at approximately 11:06 a.m. MOON texted the UC and a picture of the front entrance of McAlister's Deli, located at 2380 Health Drive SW in Wyoming, MI. After the UC told MOON they were on their way, MOON stated, "I'll only paying for yours. Not your cop buddies." MOON's vehicle was observed backed into a parking spot in front of McAlister's Deli.

86. At approximately 11:11 a.m., law enforcement officers executed the search warrant on MOON's vehicle, a white Jeep Cherokee bearing Ohio license plate JJA 1809, and on his person. MOON was taken into custody and advised of his *Miranda* rights. He waived his rights and agreed to answer questions. MOON stated he left his residence at approximately 6:00 a.m. this morning and planned to meet with a woman named Stacy for lunch. MOON stated he only planned to have lunch with the woman and that he was excited to have lunch with the UC as he was a lonely man. MOON acknowledged using

the boredinohio usernames in Motherless and Tox and stated he discussed having sex with the 12-year-old girl. MOON stated he has a sexual interest in children but was not sure if he would have an actual physical relationship with a minor. MOON stated it was possible he would have had sex with the 12-year-old girl if presented with the opportunity but stated he could not think that far in advance. MOON stated he brought an STD test with him and an STD test was located in the vehicle.

87. MOON stated he has received child pornography from others on his phone, but stated he deleted it after receipt.

#### **CONCLUSION**

88. Based on the foregoing, there is probable cause to believe that WILLIAM GEORGE MOON committed violations of 18 U.S.C. § 2422(b) and 18 U.S.C. § 2423(b), which makes it a crime to knowingly persuade, induce, entice, or coerce any individual who has not attained the age of 18 years, to engage in prostitution or any sexual activity for which any person can be charged with a criminal offense, or attempts to do so; and makes it a crime to travel in interstate commerce to engage in sexual conduct with minor or attempts to do so.